

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY Caption in Compliance with D.N.J. LBR 9004-1(b)	
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<p>In re:</p> <p>BLOCKFI INC., et al.,</p> <p style="text-align: right;">Debtors.¹</p>	<p>Chapter 11</p> <p>Case No. 22-19361 (MBK)</p> <p>Jointly Administered</p>

¹ The Debtors in these Chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: BlockFi Inc. (0015); BlockFi Trading LLC. (2487); BlockFi Lending LLC (5017); BlockFi Wallet LLC (3231); BlockFi Ventures LLC (9937); BlockFi International Ltd. (N/A); BlockFi Investment Products LLC (2422); BlockFi Services, Inc. (5965) and BlockFi Lending II LLC (0154). The location of the Debtors' service address is 100 Horizon Center Blvd. 1st and 2nd Floors Hamilton, NJ 08691.

**JOINDER OF THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS
TO DEBTORS' MOTION TO ESTIMATE THE AMOUNT OF THE
3AC CLAIMS AGAINST THE DEBTORS PURSUANT TO SECTIONS
105(A) AND 502(C) OF THE BANKRUPTCY CODE**

The Official Committee of Unsecured Creditors (the “**Official Committee**”) appointed in the above-captioned Chapter 11 cases of BlockFi, Inc. and its affiliated debtors (collectively, the “**Debtors**” or “**BlockFi**”), by and through its undersigned counsel, hereby submits this Joinder to the *Debtors’ Motion to Estimate the Amount of the 3AC Claims Against the Debtors Pursuant to Sections 105(A) and 502(C) of the Bankruptcy Code* [Docket No.1346] (the “**3AC Estimation Motion**”) and adopts all arguments and evidence referenced therein.

The Official Committee shares the Debtors’ conclusions that (i) the 3AC Claims² are contingent and unliquidated, (ii) failure to estate the 3AC Claims would cause undue delay in the administration of these cases, and (iii) this Court has the authority to estimate the 3AC Claims. As to this third point, the Official Committee respectfully asserts that not only does the Court have the requisite authority to estimate the 3AC Claims under sections 105(a) and 502(c) of the Bankruptcy Code, but section 502(c) so requires that the Court estimate the 3AC Claims.³

For the foregoing reasons and the reasons set forth in the 3AC Estimation Motion, the Official Committee joins in the Debtors request to estimate the 3AC Claims at \$0.00, and requests

² Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the 3AC Estimation Motion.

³ See 11 U.S.C. § 502(c)(1) (“There **shall be** estimated for purpose of allowance under this section any contingent or unliquidated claim, the fixing or liquidation of which, as the case may be, would unduly delay the administration of the case.”) (emphasis added); *In re Continental Airlines Corp.*, 60 B.R. 472, 480 (“unlike the 1898 Bankruptcy Act under which *Gary* was decided, the 1978 Bankruptcy Reform Act requires the bankruptcy court to estimate contingent or unliquidated claims where liquidation of the claim would unduly delay closing of the case.”);

that the 3AC Estimation Motion be granted. The Official Committee reserves its rights to modify or supplement this joinder as necessary and appropriate.

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Respectfully submitted,

Dated: August 17, 2023

By: /s/ Daniel M. Stolz

GENOVA BURNS LLC

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